

**U.S. DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF ILLINOIS  
WESTERN DIVISION**

ERIC BERNARD (#r-25398), a/k/a TERRELL  
KING,

Plaintiff,

v.

ILLINOIS DEPARTMENT OF CORRECTIONS  
and WEXFORD HEALTH SOURCES, INC.,

Defendants.

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ERIC BERNARD (#R-25398), a/k/a TERRELL  
KING,

Plaintiff,

v.

ROB JEFFRIES, ANDREA TACK, SONJA  
NICKLAUS, JOHN VARGA, ANN GRANGER,  
WEXFORD HEALTH SOURCES, INC.,  
MONICA CARPENTER, CELIA GROSSMAN,  
LACI BARLO, UNKNOWN IDOC OFFICIALS  
and UNKNOWN MEDICAL STAFF  
DEFENDANTS,

Defendants.

No. 20cv50412

Hon. Iain D. Johnston  
Hon. Margaret J. Schneider

No. 20cv50413

Hon. Iain D. Johnston  
Hon. Margaret J. Schneider

**JOINT MOTION FOR AN EXTENSION OF THE FACT DISCOVERY DEADLINE**

NOW COME the parties, by their respective undersigned counsel, and submit the following joint motion for an extension of time:

1. The parties are engaged in oral depositions at this time. After scheduling conflicts, and a joint agreement whereby the Plaintiff's deposition would be completed first, the parties have completed one deposition of Plaintiff, done by the Wexford-defendants'



counsel, and have jointly stipulated to an additional, limited deposition of Plaintiff by IDOC-defendants' counsel to be conducted on July 29, 2024.

2. The parties have scheduled several pending depositions. Among these scheduled depositions include those of Andrea Tack, John Varga, Sonja Nicklaus, Monica Carpenter, Rob Jeffreys, Mike Tunink, Dr. Mirella Susnjar, Jennifer Hoffman, and Jacob Long. These have been noticed for various dates in July and August.

3. Additional depositions are contemplated, including those of Dr. Merrill Zahtz, Dr. Carlos Fior, Dr. Melissa Young, Dr. Jamie Chess, and Harley Moreland. Counsel for Wexford Defendants has represented that Dr. Merrill Zahtz, Dr. Carlos Fior, and Dr. Melissa Young do not have availability for a deposition until September. Notices are outstanding, however; the parties have discussed and contemplate dates for several of these depositions in the month of September.

4. Counsel for the IDOC and IDOC-defendants is in the process of investigating all relevant video-recorded discovery and related incident reports not yet produced. Counsel are otherwise conferring on the completeness of outstanding written discovery with the IDOC.

5. After joint correspondence, counsel for the parties would request an extension of the fact discovery deadline to October 31, 2024, to complete these planned depositions, conduct any necessary follow-up investigations, and to otherwise confer on, produce, and identify non-oral discoverable materials (including written, photographic, and video production).



6. Counsel are working amicably to narrow discovery requests and resolve outstanding discovery issues in all other respects. This request has been made jointly and would not serve to prejudice the rights of any party or unduly delay proceedings.

Respectfully Submitted,

By: /s/ Maria Makar

One of the attorneys of Plaintiff, ERIC  
BERNARD

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By: /s/ Sergio Navarrete

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DEPARTMENT OF CORRECTIONS  
(IDOC), and IDOC Defendants



**CERTIFICATE OF SERVICE**

I hereby certify that on July 26, 2024, I electronically filed the foregoing document with the clerk of the court for Northern District of Illinois, using the electronic case filing system of the court. The electronic case filing system sent a “Notice of E-Filing” to the attorneys of record in this case.

/s/ Joseph M. Ranvestel